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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Thirteenth session,
Geneva, 7-17 July 1997,
agenda item (3 (d))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other draft amendments

Proposal to amend Chapter 15

Transmitted by the European Confederation of Paint, Printing ink and Artist's Colours Manufacturers's Association (CEPE)

Proposal to amend Chapter 15 - Special Recommendations for Dangerous Goods in Limited Quantities, Paragraph 15.3 Packaging.

1. Insert introductory text for paragraph 15.3 as follows:-

"15.3 Packaging

Dangerous goods in limited quantities transported according to these special recommendations shall be packaged as follows:-"

2. Insert a new paragraph 15.3.1 as follows:-

"15.3.1 In suitable packagings meeting the requirements of Chapter 9; or"

3. Renumber existing paragraph 15.3.1 to 15.3.2 and delete the first line "Dangerous goods transported according to these special recommendations should be transported only"

4. Renumber existing paragraph 15.3.2 to 15.3.3

Justification

Limited quantity packagings are by nature small size receptacles. There are various requirements concerning the information that has to be provided on these packagings, such as:-

- Health and Safety for Supply Regulatory information
- Transport Regulatory information
- Instructions for use
- Commercial information

The IMDG Code, and also in Europe the ADR Regulations, restricts Limited Quantities to being transported as inner receptacles placed in suitable outer packagings, or in shrink-wrapped or stretch-wrapped trays. If industry wishes to use packagings conforming to Chapter 9 and to avail itself of the derogations available in Chapter 15 of these recommendations, and in particular paragraphs 15.5 and 15.7, such packagings would have to be placed in outer packagings or shrink-wrapped or stretch-wrapped trays. As packagings conforming to Chapter 9 are performance tested, such requirements are anomalous and an unnecessary use of resources which Regulatory bodies are endeavouring to avoid. This proposal seeks to correct this and permit industry to make the most efficient use possible of the available space on small packagings

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TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Thirteenth session,
Geneva, 7-17 July 1997,
agenda item (3 (a))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Tanks (Part 3, Chapter 4.2 and 6.6)

Leakproofness testing of portable tanks for deeply refrigerated liquefied gases

Transmitted by the European Portable Tank Association/
Tank Container Association (EPTA/TCA)

At the meeting of the Committee of Experts in December 1996 a proposal from the United Kingdom was considered and rejected. This proposed reducing the minimum pressure at which leakproof testing of portable tanks for deeply refrigerated gases should take place from 90% to not less than 25% of the maximum allowable working pressure (mawp) (see ST/SG/AC.10/R516, and the report of the Committee of Experts meeting ST/SG/AC.10/23 at paragraph 89).

There are important safety considerations in how testing at this level of mawp should be carried out. EPTA/TCA therefore propose that a warning be inserted in the relevant part of Chapter 17 of the Recommendations.

Proposal

Insert the following note at the end of 6.6.4.14.3 (reformatted text) (formerly 17.15.32):

"Note: Pressure testing using gases (including air) as the pressurising medium is potentially dangerous. The energy stored within a shell under test could be released explosively if it should fail. Appropriate precautions should be taken before attempting leakproof testing. The test medium used for the leakproofness test shall in no case create an hazard to the inspecting personnel or any persons in the vicinity."

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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
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agenda item (3 (a))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Tanks (Part 3, Chapter 4.2 and 6.6)

Coding of Portable Tanks
Use of Tank Strings and/or Tank types

Transmitted by the European Portable Tank Association/
Tank Container Association (EPTA/TCA)

Justification

The EPTA and the TCA have separately and jointly discussed the use of Tank Strings as proposed by Germany (ST/SG/AC.10/R 531) and Tank Types (as in ST/SG/AC.10/R 528) as proposed by the United States of America designating portable tanks, particularly tanks for liquids.

The conclusion of these deliberations is that we could find no support for the German proposal for the tank parametric string. We could, however, find extensive support for the use of tank types.

For the generality of dangerous liquids, EPTA/TCA note the work taking place to establish a rationalised approach to assigning substances to portable tanks. EPTA/TCA believe that this work will considerably reduce the number of tank types for liquids to the extent that at most 11 or 12 tank types may be needed. This simplification lends itself to tank types more than tank strings. (EPTA/TCA welcome the 'rationalised approach' initiative.)

With respect to liquids tanks, EPTA/TCA consider it essential that a clear method should be established to show that there is an hierarchy of tanks starting with the simplest, a tank with a 1.5 bar test pressure and two closures on a bottom outlet rising to a 10 bar test pressure tank with no openings below the level of the liquid, an equivalent shell thickness of 10mm and frangible disc. It needs to be clearly understood from the method of coding tanks chosen that a substance may not be carried in a tank type of lower specification than the minimum requirements laid down for it. On the other hand, it needs to be clearly understood from the method chosen that a tank type of higher specification can be used for that substance. We do not see how this can be easily demonstrated by the tank string system whereas we contend that the tank type system can. For us in the affected industry this is an overriding argument in favour of the tank types.

We also believe that the tank type system will be more easily enforceable than the tank string system.

Proposals:

EPTA/TCA propose the adoption of a tank type system for assigning substances to portable tanks in line with the developing 'rationalised approach'.

EPTA/TCA proposes the use of the tank type system in three ways:-

1) As a mark on portable tanks in the form of a 'decal';

2) As an indication on the approval certificate of portable tanks;

3) In the relevant tables in the Recommendations.

Further Discussion.

EPTA/TCA propose that the tank type be marked in the form of a 'decal' as the tank type may change in service e.g. if it is converted from bottom outlet to no openings below the level of the liquid or e.g. due to the insertion or removal of frangible discs before the emergency pressure relief valve. A system of coding tank containers is already provided for in the ISO series of standards for Series 1 Freight Containers. The relevant standard could be amended to take account of a tank type system adopted by the Committee of Experts and EPTA/TCA are prepared to initiate the appropriate amendments.

With respect to the approval certificates, these could state that a tank meets Type zz e.g. if the frangible disc(s) are in place but only Type yy if the frangible disc(s) are removed.

Operationally, it would be the responsibility of the owner/operator to ensure that the correct tank type is displayed.

We consider that using a tank type system will make it much easier to avoid lengthy lists of substances being attached to the approval certificates as at present.

EPTA/TCA take note of the significant efforts made by both Germany and the United States of America to provide systems for the coding of tanks and would thank both countries for the work they have done.